

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
) Criminal No.: 19-10080-NMG
v.)
)
GAMAL ABDELAZIZ *et al.*,)
)
)
Defendants)

**GOVERNMENT'S OPPOSITION TO DEFENDANT'S MOTION FOR LIMITING
INSTRUCTION REGARDING PAYMENTS TO DONNA HEINEL [DKT. 2252]**

The government has previously explained why the defendants' proposed limiting instructions regarding co-conspirators, including Jovan Vavic, are argumentative and unsupported by First Circuit precedent. *See, e.g.*, Dkt. 2240, 2249. The Court denied the defendants' motions seeking those limiting instructions. *See* Dkt. 2253 at 3–4. The government has been clear in its presentation of the evidence about the timing of payments from defendant Abdelaziz and the timing of payments to Donna Heinel, as it was in the presentation of the evidence about the timing of payments from defendant Wilson and the timing of payments benefiting Vavic. *See id.* For the reasons previously stated by the government and for the reasons provided by the Court in its order, defendant Abdelaziz's latest motion for a limiting instruction regarding payments to Heinel (Dkt. 2252) should be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: September 21, 2021

/s/ Ian J. Stearns

IAN J. STEARNS